

EXHIBIT I

From: Kelley, Derek W. <Derek.Kelley@klgates.com>
Sent: Tuesday, January 3, 2023 11:55 AM
To: Nicholas A. Rendino <nrendino@kasowitz.com>; Nickerson, Morgan T. <Morgan.Nickerson@klgates.com>
Cc: Christine A. Montenegro <CMontenegro@kasowitz.com>; Jason S. Takenouchi <JTakenouchi@kasowitz.com>;
McDevitt, Jerry <Jerry.McDevitt@klgates.com>; Finnerty, Christopher S. <Chris.Finnerty@klgates.com>
Subject: RE: MLW v. WWE - Draft Protective Order and ESI Protocol

Nick – Apologies for the delay. Attached are our revisions to the draft protective order and ESI protocol.

Best,
Derek

K&L GATES

Derek Kelley
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From: Nicholas A. Rendino <nrendino@kasowitz.com>
Sent: Tuesday, January 3, 2023 10:54 AM
To: Nickerson, Morgan T. <Morgan.Nickerson@klgates.com>
Cc: Christine A. Montenegro <CMontenegro@kasowitz.com>; Jason S. Takenouchi <JTakenouchi@kasowitz.com>;
McDevitt, Jerry <Jerry.McDevitt@klgates.com>; Kelley, Derek W. <Derek.Kelley@klgates.com>; Finnerty, Christopher S.
<Chris.Finnerty@klgates.com>
Subject: RE: MLW v. WWE - Draft Protective Order and ESI Protocol

Morgan,

Following up on the emails below and on our outstanding request from our December 19 meet and confer, you promised edits to the Protective Order and ESI Protocol by last Wednesday (January 28). Please advise on when we can expect them.

Best,

Nick

From: Nickerson, Morgan T. <Morgan.Nickerson@klgates.com>
Sent: Friday, December 23, 2022 1:50 PM
To: Nicholas A. Rendino <nrendino@kasowitz.com>
Cc: Christine A. Montenegro <CMontenegro@kasowitz.com>; Jason S. Takenouchi <JTakenouchi@kasowitz.com>; McDevitt, Jerry <Jerry.McDevitt@klgates.com>; Kelley, Derek W. <Derek.Kelley@klgates.com>; Finnerty, Christopher S. <Chris.Finnerty@klgates.com>
Subject: RE: MLW v. WWE - Draft Protective Order and ESI Protocol

Hi Nick,

As expected, the holiday schedule slowed things down a bit on our end. Nonetheless, we expect to have revisions to the protective order to you by Wednesday of next week at the latest.

Best,
Morgan

From: Nicholas A. Rendino <nrendino@kasowitz.com>
Sent: Friday, December 23, 2022 12:01 PM
To: Nickerson, Morgan T. <Morgan.Nickerson@klgates.com>
Cc: Christine A. Montenegro <CMontenegro@kasowitz.com>; Jason S. Takenouchi <JTakenouchi@kasowitz.com>; McDevitt, Jerry <Jerry.McDevitt@klgates.com>; Kelley, Derek W. <Derek.Kelley@klgates.com>; Finnerty, Christopher S. <Chris.Finnerty@klgates.com>
Subject: Re: MLW v. WWE - Draft Protective Order and ESI Protocol

Morgan and Derek,

Following up on our discussions, can you please let us know when we can expect edits to the Protective Order?

Regards,
Nick

On Dec 20, 2022, at 10:22 AM, Nicholas A. Rendino <nrendino@kasowitz.com> wrote:

Hi Morgan and Derek:

Following up on our meet and confer yesterday, attached please find our edits to the ESI Protocol. Please also let us know when we can expect edits to the Protective Order.

Regards,
Nick

From: Nickerson, Morgan T. <Morgan.Nickerson@klgates.com>
Sent: Thursday, December 15, 2022 1:53 PM
To: Nicholas A. Rendino <nrendino@kasowitz.com>
Cc: Christine A. Montenegro <CMontenegro@kasowitz.com>; Jason S. Takenouchi <JTakenouchi@kasowitz.com>; McDevitt, Jerry <Jerry.McDevitt@klgates.com>; Kelley, Derek W.

<Derek.Kelley@klgates.com>; Finnerty, Christopher S. <Chris.Finnerty@klgates.com>

Subject: RE: MLW v. WWE - Draft Protective Order and ESI Protocol

Hi Nick,

Monday at 2pm est works for us. Will you be circulating a dial in or would you like me to circulate one?

Best,
Morgan

From: Nicholas A. Rendino <nrendino@kasowitz.com>

Sent: Wednesday, December 14, 2022 8:13 PM

To: Nickerson, Morgan T. <Morgan.Nickerson@klgates.com>

Cc: Christine A. Montenegro <CMontenegro@kasowitz.com>; Jason S. Takenouchi <JTakenouchi@kasowitz.com>; McDevitt, Jerry <Jerry.McDevitt@klgates.com>; Kelley, Derek W. <Derek.Kelley@klgates.com>; Finnerty, Christopher S. <Chris.Finnerty@klgates.com>

Subject: Re: MLW v. WWE - Draft Protective Order and ESI Protocol

Morgan,

Given the outstanding issues with the proposed protective order and the ESI protocol, as well as the lack of consideration of our proposed protocols for expert and fact discovery, we would like to schedule a meet and confer to see if we can narrow the issues before seeking the court's intervention.

Would you be available for a call on Monday (12/19) after 1pm or Tuesday (12/20) between 10:30 and 3:00?

Thanks,

Nick

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On Dec 13, 2022, at 4:26 PM, Nickerson, Morgan T. <Morgan.Nickerson@klgates.com> wrote:

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Nick,

Attached please find my client's further edits and comments to the draft protective order and draft ESI protocol. Kindly let me know if you have any questions or concerns with the same.

Best regards,
Morgan



Morgan T. Nickerson

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<DRAFT_ESI_Protocol WWE 12-13-2022 Edits.DOCX>

<DRAFT__Proposed_Protective_Order WWE Edits.DOCX>

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<DRAFT_ESI_Protocol (KBT 12.20 edits).DOCX>

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